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Via ECF

July 21, 2023

The Honorable Marcia M. Henry
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Guan v. Mayorkas*, No. 19-cv-6570 (PKC/MMH)

Dear Judge Henry:

We represent Plaintiffs Bing Guan, Go Nakamura, Mark Abramson, Kitra Cahana, and Ariana Drehsler. Defendants are Alejandro Mayorkas, Secretary of the U.S. Department of Homeland Security (“DHS”) in his official capacity; Troy Miller, Acting Commissioner of U.S. Customs and Border Protection (“CBP”) in his official capacity; and Patrick Lechleitner, Acting Director of U.S. Immigration and Customs Enforcement (“ICE”) in his official capacity.¹

We write with consent of Defendants to jointly request that the Court adjourn the current July 31, 2023, deadline for completion of fact discovery. As the parties discussed with the Court at the last status conference on April 13, 2023, the parties anticipate that they will need approximately two to three months for depositions following the date that the written discovery issues raised in Plaintiffs’ pending motion to compel have been resolved and additional or less-redacted documents have been produced (if any).

The parties have conferred and agreed that an extension of the July 31 deadline is therefore warranted, and that the specific amount of time the parties expect to request will depend in part on the Court’s ruling on the motion to compel. Thus, the parties respectfully request that the current fact discovery deadline be adjourned pending resolution of Plaintiffs’ motion to compel, after which the parties propose to confer and provide a status report to the Court with a proposed schedule for concluding fact discovery in this matter.

* * *

¹ Patrick Lechleitner has succeeded Tae Johnson as acting director of ICE and is automatically substituted as a defendant pursuant to Fed. R. Civ. P. 25(d).

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The parties appreciate the Court's continued attention to this matter.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Andrew W. Hahn", with a stylized flourish at the end.

Andrew W. Hahn

cc: All counsel of record by CM/ECF